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February 11, 2005

Mr. Jim Tischler
California Regional Water Quality Control Board
North Coast Region
5550 Skyline Boulevard, Suite A
Santa Rosa, CA 95403

RE: **Quarterly Summary Report – Fourth Quarter 2004**
SECOR Project No.: 77CP.60008.02.0249

Dear Mr. Tischler:

On behalf of ConocoPhillips, SECOR International Incorporated (SECOR) is forwarding the quarterly summary report for the following location:

Service Station	**Location**
76 Service Station No. 11249	1300 Farmers Lane Santa Rosa, California

Sincerely,
SECOR International Incorporated

Rusty E. Benkosky, P.E.
Principal Engineer

Attachment 1 – TRC's *Quarterly Monitoring Report, October Through December 2004* Dated January 11, 2005

cc: Ms. Liz Sewell, ConocoPhillips
Mr. John Anderson, County of Sonoma, Public Health Division, 3273 Airway Drive, Suite D, Santa Rosa, CA 95403
Mr. Mark McKormick, Santa Rosa Fire Department, 955 Sonoma Avenue, Santa Rosa, CA 95404
Kyle Christie British Petroleum, 6 Centerpoint Drive, First Floor, La Palma, CA 90623-1066

QUARTERLY SUMMARY REPORT
Fourth Quarter 2004

76 Service Station No. 11249
1300 Farmers Lane
Santa Rosa, California

City/County ID #: Santa Rosa

County: Sonoma

PREVIOUS ASSESSMENT

The site was occupied by a Mobil Oil service station until 1992, at which time BP acquired the property and assumed service station operations and management of ongoing environmental work. Tosco Marketing Company (Tosco) acquired the property on July 22, 1994.

In April, 2002 Emcon Associates (Emcon) installed one on-site groundwater monitoring well (MW-1) and drilled three exploratory soil borings (THP-1 through THP-3).

During November 1993, Alisto Engineering Group (Alisto) installed three groundwater monitoring wells (MW-2 through MW-4) at the site. The boreholes were advanced to approximately 28 feet below ground surface (bgs). Analysis of soil samples indicated the presence of total petroleum hydrocarbons as gasoline (TPHg) at 140 parts per million (ppm), and ethylbenzene at 0.46 ppm. TPHg and benzene were detected in groundwater up to 89 parts per billion (ppb) and 1.4 ppb, respectively.

In January 1999, Environmental Resources Management (ERI) supervised the removal of one 10,000-gallon used oil underground storage tank (UST), which was observed to be intact with no visible holes or cracks. Soil samples collected from beneath the UST contained total petroleum hydrocarbons as diesel (TPHd), TPHg, and ethylbenzene up to concentrations of 312 ppm, 2.3 ppm, and 0.011 ppm, respectively. This used oil UST was not utilized by Tosco between July 1994 and the time of its removal (ERI, April 20, 1999).

In November and December 1999, ERI oversaw the removal and replacement of product lines and dispensers, and collected soil samples from the trenches and beneath the dispensers. Soil samples contained up to 605 ppm TPHg, 0.0204 ppm benzene, and 0.477 ppm methyl tertiary butyl ether (MtBE).

In March 2000, ERI supervised the drilling of eight soil borings to a maximum depth of 47 feet bgs. Three of the borings were converted to groundwater monitoring wells (MW-5 through MW-7). Petroleum hydrocarbons and MtBE were detected in soil and groundwater beneath the site.

In June 2001, ERI supervised the installation of two additional wells (MW-7D and MW-10) and two dual completion monitoring wells (MW8S/D and MW9S/D). Soil samples were not collected during drilling. Post-development groundwater samples contained up to 130 ppb TPHg and 33 ppb MtBE.

In July 2002, one extraction well (EX-1) and one observation well (OB1) installed at the site. Concentrations of TPHg and MtBE were reported in soil samples up to 64 milligrams per kilogram (mg/kg) and 0.96 mg/kg, respectively.

In October, 2002, ERI drilled and sampled two direct push soil borings (GP-1 and GP-2) on the west side of Farmers Lane opposite the site. The borings were respectively advanced to 28 and 32 feet bgs. Petroleum hydrocarbons and MtBE were not detected in soil samples. Grab groundwater samples contained up to 620 ppb TPHg and 4,400 ppb MtBE.

In September 2004, SECOR submitted a work plan for the installation of two off-site wells (MW-11 and MW-12) and performance of a dual phase extraction (DPE) test at the site.

SENSITIVE RECEPTORS

In 2000, ERI conducted at a door to door and agency groundwater receptor survey. Nine water supply wells were identified during the door-to-door well survey, one of which was a municipal water supply well operated and maintained by the City of Santa Rosa. Six of these wells were reported as being abandoned or not being used; one well was reported as being used for irrigation purposes; and one well was reported as being used for drinking and irrigation purposes. The closest active water supply well to the site is a private domestic well located approximately 1,000 feet northwest of the site.

MONITORING AND SAMPLING

The site is has been monitored and sampled since the fourth quarter 1992. Currently, a total of 13 wells are monitored and sampled on a quarterly basis. Ten wells are screened in the shallow water bearing zone, and three wells are screened in the deeper zone (approximately 60 feet bgs). Groundwater samples are currently analyzed for the presence of TPHg; benzene, toluene, ethylbenzene, and total xylenes (BTEX); and fuel oxygenates by Environmental Protection Agency (EPA) Method 8260B.

REMEDIAL STATUS

Approximately 65 tons of contaminated soil was removed from the site during product line removal and replacement activities in 2000. Currently, remedial activities are not being performed at the site. DPE and ozone microsparge systems were two remedial options considered for application at the site; however, additional delineation of the dissolved plume and remedial feasibility testing is recommended before a remedial technology can be selected.

CHARACTERIZATION STATUS

Contamination in soil is adequately delineated. The majority of soil impacts is limited to the capillary fringe in the area of the product dispensers. The dissolved plume is delineated to the south, east, and north, but has not been fully delineated to the northwest and west.

WASTE DISPOSAL

The volume of purged groundwater generated and disposed of during the quarterly groundwater monitoring event is reported by TRC in their quarterly monitoring report.

RECENT SUBMITTALS/CORRSPONDENCE

SECOR submitted a work plan for the installation of two off-site wells (MW-11 and MW-12) and performance of a dual phase extraction (DPE) test at the site. SECOR's September 3, 2004 *Proposal to Modify Remediation Plan and Work Plan for Additional Off-Site Assessment* was granted by the Regional Water Quality Control Board – North Coast Region (RWQCB-NCR) correspondence dated December 20, 2004.

THIS QUARTER ACTIVITIES (Fourth Quarter 2004)

1. Groundwater monitoring and sampling activities were performed by TRC.
2. Received RWQCB-NCR approval of SECOR's September 3, 2004 *Proposal to Modify Remediation Plan and Work Plan for Additional Off-Site Assessment.*

NEXT QUARTER ACTIVITIES (First Quarter 2005)

1. TRC will perform groundwater monitoring and sampling.
2. Obtain Cal-Trans performance bond for off-site monitoring well installation.
3. Submit monitoring well permits once Cal-Trans bond and permits are obtained.
4. Perform DPE feasibility testing.

CONSULTANT: SECOR International Incorporated

ATTACHMENT 1
TRC'S *QUARTERLY MONITORING REPORT, OCTOBER THROUGH DECEMBER 2004*, DATED JANUARY 11, 2005

76 Service Station No. 11249
1300 Farmers Lane
Santa Rosa, California
SECOR Project No.: 77CP.60008.02.0249
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SEE TRC

4Q04 QMR